

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
IN ADMIRALTY

MARKEL AMERICAN INSURANCE	)	
COMPANY,	)	
Plaintiff,	)	
	)	
v.	)	CASE NO. 04-CIV-12144 (GAO)
RAYMOND FERRONE,	)	
Defendant.	)	
	)	
	)	

**PLAINTIFF'S MOTION TO COMPEL DISCOVERY RESPONSES**

COMES NOW the Plaintiff, MARKEL AMERICAN INSURANCE COMPANY, by and through its undersigned attorneys, and pursuant to Rule 37 of the Federal Rules of Civil Procedure, moves this Court for an Order compelling the plaintiff to respond to discovery requests served on or about January 31, 2005.

On January 31, 2005, the plaintiff served interrogatories and a request for production of documents to counsel for defendant Raymond Ferrone. To date, neither responses nor objections have been received by undersigned counsel.

WHEREFORE, we respectfully request an order compelling the defendant 1) to provide the response to request for production of documents within twenty days; and 2) to answer the interrogatories within twenty days.

**GOOD FAITH CERTIFICATION**

Undersigned counsel certifies that he made a good faith effort to secure the requested information without court intervention by telephone on March 9, 2006.

Dated: March 9, 2006

MARKEL AMERICAN INSURANCE  
COMPANY  
By its Attorneys

I hereby certify that a true copy of the  
above document was served upon (each  
party appearing pro se and) the attorney  
of record for each (other) party by mail  
(by hand on 3/9/2006)

Farley



Lauren Motola-Davis, #638561  
Michael T. Farley, #640593  
MORRISON MAHONEY LLP  
121 South Main Street, Suite 600  
Providence, RI 02903-7141  
(401) 331-4660      Fax (401) 621-4660